

S. LANE TUCKER
United States Attorney

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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,)	No. 3:22-cr-00094-JMK-MMS
)	
Plaintiff,)	<u>COUNT 1:</u>
)	AIDING AND ABETTING
vs.)	COMPUTER INTRUSIONS
)	Vio. of 18 U.S.C. §§ 1030(a)(5)(A) and 2
JOSHUA LAING, d/b/a)	
“TRUESECURITYSERVICES.IO”,)	<u>CRIMINAL FORFEITURE</u>
)	<u>ALLEGATION:</u>
)	18 U.S.C. §§ 981, 982, 1030; 21 U.S.C.
Defendant.)	§ 853; and 28 U.S.C. § 2461
_____)	

INFORMATION

The United States Attorney that:

COUNT 1

1. From at least on or about 2014 and through at least on or about November 16, 2022, within the District of Alaska and elsewhere, the defendant, JOSHUA LAING

operating a service called “TRUESECURITYSERVICES.IO,” knowingly caused and knowingly and intentionally aided and abetted unlawful computer intrusions and attempted unlawful computer intrusions, in violation of 18 U.S.C. § 1030(a)(5)(A) and (b), that is, LAING knowingly caused the transmission of a program, information, code, and command, and knowingly aided and abetted others in doing the same and in attempting to do the same, and as a result of such conduct, intentionally caused damage and attempted to cause damage without authorization to a protected computer, and the offense caused damage affecting ten or more protected computers during a one-year period, specifically from November 15, 2021 through November 16, 2022.

All of which is in violation of 18 U.S.C. § 1030(a)(5)(A) and 2.

CRIMINAL FORFEITURE ALLEGATION

18 U.S.C. §§ 981, 982, 1030; 21 U.S.C. § 853; and 28 U.S.C. § 2461

2. The allegations contained in Count 1 of this Indictment are realleged and incorporated by reference for the purpose of alleging forfeiture.

The United States Attorney hereby finds that:

3. There is probable cause that the property described in this CRIMINAL FORFEITURE ALLEGATION is subject to forfeiture pursuant to the statutes described herein.

4. Pursuant to Federal Rule of Criminal Procedure 32.2(a), the United States of America gives notice to the defendant, JOSHUA LAING, that, in the event of the defendant’s conviction of the offense charged in Count 1 of this Indictment, the United

States intends to forfeit the defendant's property as further described in this CRIMINAL FORFEITURE ALLEGATION.

5. Upon conviction of 18 U.S.C. § 1030, as set forth in Count 1 of this Indictment, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the violations, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

SUBSTITUTE ASSETS

6. If any of the property described above, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been comingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to and intends to seek forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 982(b)(1), 1030(i)(2), and 28 U.S.C. § 2461(c).

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All pursuant to 18 U.S.C. §§ 981, 982, 1030; 21 U.S.C. § 853; and 28 U.S.C. § 2461.

RESPECTFULLY SUBMITTED December 12, 2022, in Anchorage, Alaska.

S. LANE TUCKER
United States Attorney

s/ Adam Alexander
ADAM ALEXANDER

Assistant United States Attorney
United States of America

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2022,
a true and correct copy of the foregoing
was served electronically on the following:

Assistant Federal Defender Gretchen Staft

s/ Adam Alexander
Office of the United States Attorney